

**REBUTTAL TESTIMONY OF
KAREN H. COOPER
ICC NO. 00-0679**

ILLINOIS
COMMERCE COMMISSION

Jan 2 10:42 AM '01

**CITY OF COLUMBIA, ILLINOIS vs. ILLINOIS-AMERICAN WATER COMPANY
COMPLAINT AS TO PROVIDING SERVICES OUTSIDE OF THE OFFICIAL FILE
UTILITY'S CERTIFICATED SERVICE AREA IN COLUMBIA, ILLINOIS**

ILL. C. C. DOCKET NO. 00-0679

IAWC PAGE NO. 2

Witness _____

Date 3/5/01 Reporter Geel

1 Q. Please state your name.

2 A. Karen H. Cooper.

3 Q. Are you the same Karen H. Cooper who has previously filed direct testimony in this
4 matter?

5 A. Yes.

6 Q. Have you reviewed the direct testimony filed on behalf of the City of Columbia by
7 Mayor Lester Schneider; Ann Heiligenstein, P.E.; and Kenneth L. Vaughn?

8 A. Yes, I have.

9 Q. Are you familiar with the area and the facilities discussed in the direct testimonies
10 filed on behalf of the City of Columbia?

11 A. Yes; although I had not previously been provided with information concerning the "plan"
12 of the City of Columbia to install a 12-inch diameter line northerly then easterly from
13 Columbia's 500,000 gallon water storage tank to Quarry Road; to then bore under the
14 Quarry Road to the east side of Quarry Road and run a 6-inch diameter line along the east
15 side of Quarry Road to the intersection of Quarry Road and Illinois Highway 158; and
16 then to again bore under Quarry Road and install a 6-inch diameter water line along the
17 north side of Highway 158 to provide water service to the three customers who reside
18 between Centerville Avenue and Quarry Road on the north side of Illinois Highway 158.

1 **Q. Each of the City's witnesses indicates that the City "could" be able to install the**
2 **City's contemplated facilities within "about six (6) months". Is Illinois-American**
3 **currently in a position to provide this service?**

4 **A. Yes. In fact, as discussed previously, Illinois-American is currently providing service to**
5 **the John Dawson family located at 625 State Route 158. This service was installed on**
6 **August 21, 2000.**

7 **Q. Mayor Schneider refers to the service being provided by Illinois-American as**
8 **"redundant water service" on page 4 of his testimony. Is Illinois-American's water**
9 **service redundant?**

10 **A. No. In fact, if the City continues with its plans to construct facilities to provide service to**
11 **these three customers, the City's service would be redundant because Illinois-American**
12 **already has facilities in this area capable of and actually providing this service.**

13 **Q. Also on page 4, Mayor Schneider indicates that the City is opposed to Illinois-**
14 **American providing water service to customers located outside of Illinois-**
15 **American's certificated service area. Is Illinois-American providing service outside**
16 **of its certificated area?**

17 **A. No. The metering point is within Illinois-American's certificated area.**

18 **Q. Each of the City's witnesses indicates that the cost for the City to install the facilities**
19 **it is contemplating to provide service to these customers could be \$122,000. Is this**
20 **cost less than the cost for Illinois-American to provide this service.**

21 **A. No. The total cost for Illinois-American to provide this service, as discussed in my direct**
22 **testimony, would be \$5,892.65.**

1 **Q. Do you have any other comments concerning the testimony filed on behalf of the**
2 **City of Columbia?**

3 **A. Yes, one. On page 4 of Mayor Schneider's testimony he indicates that he had a meeting**
4 **with a "Mr. John Dalton". The individual involved in the service which is at question in**
5 **this matter is Mr. John Dawson. I have not heard of John Dalton.**

6 **Q. Does this conclude your direct testimony?**

7 **A. Yes, it does.**